

Friends of the Earth Scotland Representations on Glasgow's Local Development Plan

June 2014

Friends of the Earth Scotland is Scotland's leading environmental campaign organisation. We are an independent Scottish charity with a network of thousands of supporters and active local groups across Scotland, including an active local group in Glasgow.

We are working to clean up Scotland's air by engaging on air quality and planning issues, with specific regional focuses on Glasgow and Edinburgh, which have some of the worst air quality problems in Scotland.

Air pollution remains poor in many of Scotland's urban areas, putting people's health and the environment at risk and exacerbating social inequality.

Air pollution is especially relevant to Glasgow at present. In February this year the European Commission began legal action against the United Kingdom for failing to bring levels of Nitrogen Dioxide to within legally binding EU limits which were supposed to be achieved at the start of 2010 in several local authority areas across the UK including in Glasgow.¹ The Commission considers it unacceptable that Glasgow's Nitrogen Dioxide problem is only expected to be fixed by 2020. In April of this year, the European Commissioner confirmed that it is a real possibility that heavy fines could be handed down to the United Kingdom as a result of this lawsuit.²

We submit that the planning system has a significant impact on air quality issues and as such the need to meet European limits and Scottish standards on air quality must form an integral part of the LDP.

Our comments on specific parts of the LDP are as follows:

1) City Profile

Air quality has an enormous impact on the health and wellbeing of Glaswegians, the economy, and the environment, which should be reflected in the Social, Economic and Environment sections of the City Profile and Context section.

Social

In April 2014, Public Health England, which is an executive agency of the UK's Department of Health, quantified the number of deaths across the UK which arise from exposure to pollution from fine particles (also known as "PM2.5") in a report "Estimating Local Mortality Burdens

¹ European Commission Press Release, "Environment: Commission takes action against UK for persistent air pollution problems" (20 February 2014), available at http://europa.eu/rapid/press-release_IP-14-154_en.htm

² Joe Hennon, European Commission spokesperson, speaking on BBC Radio 4 "World at One" on 2 April 2014

associated with Particulate Air Pollution”.³ The report found that the mortality effect of air pollution from fine particles on Glaswegians is 306 deaths per year; i.e. that the equivalent of 306 deaths per year are attributable to one chemical component of air pollution: fine particles.

The report found, “*current levels of particulate air pollution have a considerable impact on public health. Measures to reduce levels of particulate air pollution, or to reduce exposure of the population to such pollution, are regarded as an important public health initiative.*”

The report found that 4.7% of all deaths in Glasgow are from exposure to fine particles, and that 3333 life-years were lost to fine particles each year in Glasgow alone.⁴

Public Health England figures confirm that air pollution is Glasgow’s biggest environmental health threat.

The key issues outlined in the social section of the city profile rightly include addressing health levels and levels of health inequality. It is worth bearing in mind that air quality has a disproportionate impact on the most vulnerable in our society: children, the elderly, those in poverty and those with pre-existing health conditions.

The Development Plan is directly relevant to air pollution in that the plans contained therein will have an impact on traffic flows within the city and therefore by consequence, air pollution.

Economy

Air pollution across the UK as a whole costs the NHS between £8.5 billion and £20.2 billion a year.⁵ We recommend that a cost assessment of the impact of air pollution on the economy in Glasgow is undertaken as this would show that it is an economic as well as a social and environmental priority to tackle. Tackling air pollution would contribute towards the achievement of growing the city’s economic contribution as outlined in the Key Issues section.

Environment

The City Council has declared 4 Air Quality Management Areas across the City where Scottish Air Quality Standards are not being achieved and therefore putting public health at risk.⁶

European Law also exists and enforces legally binding limits on air quality for all Member States. These legal limits are not being met in Glasgow for Nitrogen Dioxide (mentioned above).

The environmental context of air quality which is going up the political agenda in Glasgow, Scotland and Europe needs to be reflected in the environmental contextualisation of the issues as part of the LDP.

City Challenges

In the City Challenges section at the end of this section, the City profile should identify as a challenge the need to bring Glasgow’s air quality to within legally binding limits required by EU law⁷ and Scottish Regulatory standards on air quality.

2) Strategic Approach

³ Public Health England, “Estimating Local Mortality Burdens associated with Particulate Air Pollution” (April 2013), http://www.hpa.org.uk/webc/HPAwebFile/HPAweb_C/1317141074607

⁴ Table 3 at page 20.

⁵ Defra, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (July 2007)

⁶ Glasgow City Council, "Air Quality Progress Report for Glasgow City Council" (June 2013), Section 1.5, <http://www.glasgow.gov.uk/CHttpHandler.ashx?id=17264&p=0>

⁷ See Annex XI (B) Directive 2008/50/EC on ambient air quality and cleaner air for Europe, <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0050&from=EN>

We support and agree with the key aims and four strategic outcomes outlined in the Strategic approach on pages 17 and 18. However we would add that 'A Green Place' should include the need to meet legally binding EU air quality limits and Scottish air quality standards.

This should also be reflected as one of the key objectives on Page 23.

3) Policies

(a) We recommend a policy which specifically addresses the need that new development does not lead to a deterioration in air quality

A new policy specifically on air quality should be introduced as part of the policies to be considered when planning development within the City of Glasgow. Such a policy should spell out that new development should not have an adverse impact, either directly, indirectly, or cumulatively, on air quality.

This is especially important in the context of the following:

- Development can have a beneficial or negative impact on air quality
- Glasgow is implicated in a legal action taken out by the European Commission against the United Kingdom for failure to reduce Nitrogen Dioxide levels to within legally binding limits by the specified deadline of 2010

There needs to therefore be join up between Planning Development Policies and the obligations on Glasgow City Council to improve air quality.

Furthermore, new Scottish Planning Policy published on 23 June 2014 says at paragraph 29 (page 9) that one of the principles by which policies and decisions should be guided is

*"avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality."*⁸

The Planning Minister also confirmed in Parliament in a written answer in September 2013,

*"The Scottish Government works closely with local authorities, Transport Scotland, SEPA and other partners to ensure that the air quality objectives are achieved. The planning system has a key role to play in this process."*⁹ (emphasis added)

(b) Policy CDP 1 on The Placemaking Principle

With regards to the quality of new development being "safe" the Supplementary Guidance should include Guidance that new developments are not to be located in areas where the air quality is poor and that they must not lead to a deterioration in air quality; as such they should be well integrated with public transport links.

We support the Development Plan's commitment to ensuring that new activity does not result in the deterioration of air quality particularly in or adjacent to Air Quality Management Areas and think this should certainly be retained, but as mentioned above we think this issue should be afforded its own policy.

(c) Policy CDP11 on Sustainable Transport

Most of Glasgow's air pollution comes from traffic and as such it is clear that traffic levels need to be cut in order to achieve the legally binding European air quality limits and Scottish standards.

Planning has a key role to play in this area.

We support the Council's aims as part of CDP 11, and support Aim 4 ("Reducing pollution

⁸ Scottish Planning Policy, <http://www.scotland.gov.uk/Resource/0045/00453827.pdf>

⁹ Written Answer 9th September S4W-17014

and other negative effects associated with vehicular travel”) but believe that it should be strengthened to provide greater alignment with the need to achieve Scottish air quality standards by including as an aim the need to reduce pollution levels *to within Scottish air quality standards*. The join up between Transport, Planning, and Air Quality is crucial to ensure the Standards are met.

Furthermore, as part of the Policy itself, major new development proposals, as well as being informed by a Transport Assessment should be informed by an Air Quality impact assessment which is derived from traffic modelling. I.e. a traffic model which predicts the impact of a new development on air quality as well as on traffic levels must be included as part of any new development proposal.